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MEMO ENDORSED

October 22, 2007

Via Facsimile

Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007-1312
Telefax Number: (212) 805-6390

Re: Norton Lilly Int'l & Security Services Northwest, Inc. v. National Navigation Co., et al.,
07 CV 4654 (WHP)

Request for Sixty (60) Day Adjournment of Pre-Trial Conference

Dear Judge Pauley:

We are attorneys for the Plaintiffs, Norton Lilly Int'l & Security Services Northwest, Inc., in the above-captioned matter. On July 3, 2007, your Honor ordered that a Pre-Trial Conference be held in this matter on August 24, 2007 at 10:00 a.m. As the defendant had yet to appear, the matter was subsequently adjourned to October 26, 2007.

In review, this case is being heard under this Court's Admiralty and Maritime Jurisdiction. It is a maritime claim for \$51,944.60. On June 5, 2007, your Honor signed an Order for the Issuance of a Process of Maritime Attachment in this action pursuant to Rule B of the Federal Supplemental Rules for Certain Admiralty and Maritime Claims. Subsequently, the

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Clerk of the Court for the Southern District of New York issued a Process of Maritime Attachment in this matter.

Further, on June 19, 2007, pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiffs filed a Notice of Voluntary Dismissal as to Defendant Louis Dreyfus Corp. The Dismissal was so ordered by your Honor on July 6, 2007.

Finally, on July 27, 2007, Plaintiffs filed a Motion to Amend the Caption in this matter in order to have the caption accurately reflect the parties that remain in the action. This Motion was granted and on September 21, 2007, your Honor signed an amended Order for the Issuance of a Process of Maritime Attachment. The Clerk of the Court for the Southern District of New York subsequently issued a Process of Maritime Attachment.

The remaining Defendant, National Navigation Co., has not appeared in this matter. Furthermore, as stated in the Declaration of George M. Chalos, dated July 27, 2007, that was previously submitted to you, and as required by Supplemental Rule B, Defendant National Navigation Co. is not present within the Southern District of New York. Additionally, no funds have been attached in this matter, although Plaintiff believes that attachable funds may soon be present in the Southern District of New York.

Under these circumstances, and pursuant to your Individual Practice Rule 1E, Plaintiffs would like to request a sixty (60) day adjournment of the Pre-Trial conference set for Friday, January 18, 2008, at 11:30 a.m. There has been one previous request for an adjournment and the Defendant has not appeared in this action.

Application granted.

SO ORDERED:

William H. Pauley III
 WILLIAM H. PAULEY III U.S.D.J.

The conference is adjourned to Jan. 18, 2008 at 10:00 a.m.

Respectfully submitted,

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